

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED  
2016 MAY 27 AM 11:44  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
AKRON

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDON CAUDLE,

Defendant.

INFORMATION

CASE NO.

**4:16CR 179**

JUDGE

**JUDGE LIOI**

Title 18, Section 1341, United States Code

The United States Attorney charges:

**MAG. JUDGE BURKE**

General Allegations

At all times material to this Information:

1. Defendant BRANDON CAUDLE was an inmate in the custody of the Federal Bureau of Prisons ("BOP"), housed first in the State of Virginia, and later in Lisbon, Ohio, which is located in the Northern District of Ohio, Eastern Division.

COUNT 1

**(Mail Fraud, in violation of 18 U.S.C. § 1341)**

2. The factual allegations of paragraph 1 of this Information are realleged and incorporated by references as if fully set forth herein.

The Scheme to Defraud

3. From in or around December 2011 and continuing through in or around April 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant devised and intended to devise a scheme and artifice to defraud multiple different creditors of Defendant and of other persons and to obtain money and property from those creditors by means of false and fraudulent pretenses, representations, and promises.

4. It was part of the scheme and artifice to defraud that Defendant contacted various creditors with whom he had previously incurred debts for goods and services that he had failed to pay. Defendant falsely represented that he had not incurred those debts and, instead, those debts had been incurred by a third party and he had been the victim of identity theft. Defendant requested that such debts be cancelled and removed from his responsibility, and that the creditors ask the national credit bureaus to remove all references to the debts from his credit files.

5. It was further part of the scheme and artifice to defraud that Defendant offered and provided similar “credit-clearing” services to third parties (his “customers”), many of whom he resided with at Elkton Federal Correction Institution in Lisbon, Ohio. More specifically, Defendant prepared and sent letters on behalf of his customers to various creditors with whom his customers had previously incurred debts for goods and services that they had failed to pay. In those letters, Defendant falsely represented that his customers had not incurred those debts and, instead, those debts had been incurred by third parties who had stolen his customers’ identities. Defendant requested that such debts be cancelled and removed from his customers’ responsibility, and that the creditors ask the national credit bureaus to remove all references to the debts from his customers’ credit files.

6. It was further part of the scheme and artifice to defraud that Defendant obtained and misused BOP letterhead to forge documents purporting to be written by a BOP official. In those documents, Defendant falsely represented on behalf of BOP that Defendant and his customers had been incarcerated and in BOP custody at the times when the debts under dispute had been incurred. Defendant submitted those forged documents to creditors as proof that Defendant and his customers had not incurred the delinquent debts.

7. It was further part of the scheme and artifice to defraud that Defendant also contacted the national credit bureaus and local Better Business Bureaus directly about these debts and sought to have them removed from his credit report and the credit reports of his customers.

The Use of U.S. Mail

8. On numerous occasions from in or about December 2011, and continuing through in or about April 2014, Defendant, for the purpose of executing and attempting to execute the scheme and artifice to defraud described above, knowingly caused documents to be delivered by and through the United States mail, according to the directions thereon, including the following:

<b>Approximate Date</b>	<b>Description of Document</b>	<b>Sender / Location</b>	<b>Recipient / Location</b>
February 1, 2012	Resolution letter describing determination that Defendant's account had been fraudulently opened, cancelling debt, and informing credit bureaus	Hooters Card, Salt Lake City, Utah	BRANDON CAUDLE, Petersburg, Virginia
May 24, 2013	Resolution letter describing determination that Defendant's account had been fraudulently opened, cancelling debt, and informing credit bureaus	AT&T, Dallas, Texas	BRANDON CAUDLE, Charlotte, North Carolina

<b>Approximate Date</b>	<b>Description of Document</b>	<b>Sender / Location</b>	<b>Recipient / Location</b>
June 13, 2013	Resolution letter describing determination that Defendant's account had been fraudulently opened based on documentation of Defendant's incarceration dates, cancelling debt, and informing credit bureaus	Optimum Outcomes, Downers Grove, Illinois	Consumer Protection Division of the Attorney General's Office, Chicago, Illinois
March 2, 2014	Package containing several letters relating to Defendant "clearing" his own outstanding debt with multiple creditors	B.C., Charlotte, North Carolina	BRANDON CAUDLE, Lisbon, Ohio
March 2014	Letter claiming identity theft in connection with delinquent account and enclosing forged BOP document as proof of incarceration	BRANDON CAUDLE and W.M., Lisbon, Ohio	GE Capital Retail Bank, Kettering, Ohio
March 16, 2014	Letter claiming identity theft in connection with delinquent account and enclosing forged BOP document as proof of incarceration	BRANDON CAUDLE and W.M., Lisbon, Ohio	M.A.R.S., Inc., Tulsa, Oklahoma
March 18, 2014	Letter regarding claimed identify theft in connection with delinquent Time Warner Cable account for R.E.	Better Business Bureau, Conway, South Carolina	R.E., Lisbon, Ohio
March 18, 2014	Letter enclosing Consumer Credit Report for E.S.	Equifax, Atlanta, Georgia	E.S., Lisbon, Ohio
March 24, 2014	Letter enclosing Personal Credit Report for C.S.	Transunion, Chester, Pennsylvania	C.S., Lisbon, Ohio
April 18, 2014	Letter responding to claim of identity theft in connection with delinquent account	First Saving Credit Card, Sioux Falls, South Dakota	M.B., Lisbon, Ohio

Effect of the Scheme

9. As a result of Defendant's fraudulent conduct, multiple different creditors were defrauded and cancelled debts that had, in fact, actually been incurred by Defendant and his customers and, further, directed the national credit bureaus to remove legitimate, unpaid debts from the credit files of Defendant and his customers.

All in violation of Title 18, United States Code, Section 1341.

**COUNT 2**  
**(Mail Fraud, in violation of 18 U.S.C. § 1341)**

10. The factual allegations of paragraph 1 of this Information are realleged and incorporated by references as if fully set forth herein.

The Scheme to Defraud

11. From in or around January 2014 and continuing through in or around April 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant devised and intended to devise a scheme and artifice to defraud multiple different large chain-restaurant businesses and to obtain money and property from those businesses by means of false and fraudulent pretenses, representations, and promises.

12. It was part of the scheme and artifice to defraud that Defendant, posing as one of his relatives who lived in North Carolina and as one of his friends who lived in Virginia, wrote complaint letters to the corporate offices of various restaurant chains, falsely claiming that the relative/friend had been a recent customer at a restaurant located in North Carolina and Virginia and had received poor service. Defendant did so with the intent of causing the corporate office of

the chain-restaurant businesses to send gift cards to his relative and friend to purchase complimentary meals.

The Use of U.S. Mail

13. On numerous occasions from in or about January 2014, and continuing through in or about April 2014, Defendant, for the purpose of executing and attempting to execute the scheme and artifice to defraud described above, knowingly caused documents to be delivered by and through the United States mail, according to the directions thereon, including the following:

<b>Approximate Date</b>	<b>Description of Document</b>	<b>Sender / Location</b>	<b>Recipient / Location</b>
March 4, 2014	Letter to Defendant containing addresses for multiple chain-restaurant corporate offices and Virginia locations	B.C., Charlotte, North Carolina	BRANDON CAUDLE, Lisbon, Ohio
March 6, 2014	Package containing multiple complaint letters directed to various chain-restaurant locations in Virginia	BRANDON CAUDLE, Lisbon, Ohio	B.C., Charlotte, North Carolina
March 18, 2014	Letter to chain restaurant in North Carolina	BRANDON CAUDLE, Lisbon, Ohio	Bojangles, Charlotte, North Carolina

Effect of the Scheme

14. As a result of Defendant's fraudulent conduct, multiple chain-restaurant businesses were defrauded and sent complimentary gift cards to Defendant's relative and friend.

All in violation of Title 18, United States Code, Section 1341.

**COUNT 3**  
**(Mail Fraud, in violation of 18 U.S.C. § 1341)**

15. The factual allegations of paragraph 1 of this Information are realleged and incorporated by references as if fully set forth herein.

**The Scheme to Defraud**

16. From in or around January 2014 and continuing through in or around April 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant devised and intended to devise a scheme and artifice to defraud the United States Postal Service and to obtain money and property from the United States Postal Service by means of false and fraudulent pretenses, representations, and promises.

17. It was part of the scheme and artifice to defraud that Defendant removed and collected used postage stamps and postage meters from envelopes and packages.

18. It was further part of the scheme and artifice to defraud that Defendant sent the used postage stamps and meters to a relative, with directions to send mail on Defendant's behalf by attaching the used postage stamps and meters to envelopes and packages along with unused, one-cent postage stamps placed on either side of the used postage. Defendant did so with the intent of causing the United States Postal Service to deliver envelopes and packages without collecting the proper postage.

**The Use of U.S. Mail**

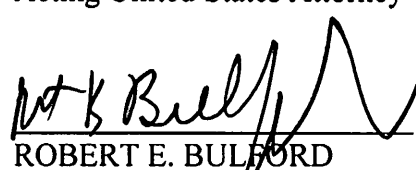
19. On numerous occasions from in or about January 2014, and continuing through in or about April 2014, Defendant, for the purpose of executing and attempting to execute the scheme and artifice to defraud described above, knowingly caused documents to be delivered by and through the United States mail, according to the directions thereon, including the following:

Approximate Date	Description of Document	Sender / Location	Recipient / Location
February 22, 2014	Package containing reused postage stamps and a letter directing relative how to use those stamps to mail letters for Defendant	BRANDON CAUDLE, Lisbon, Ohio	B.C., Charlotte, North Carolina
March 6, 2014	Forwarded letter from Commonwealth of Virginia, sent with reused postage stamps	B.C., Charlotte, North Carolina	BRANDON CAUDLE, Lisbon, Ohio
March 29, 2014	Letter to District of Idaho requesting copy of local rules, sent with reused postage stamps	B.C., Charlotte, N.C., for BRANDON CAUDLE	Clerk of Courts, U.S. District Court
April 18, 2014	Package containing used metered postage stamps and a letter directing relative how to use them to mail letters and packages for Defendant	BRANDON CAUDLE, Lisbon, Ohio	B.C., Charlotte, North Carolina
April 25, 2014	Package containing used metered postage stamps and letters to send using them on Defendant's behalf	BRANDON CAUDLE, Lisbon, Ohio	B.C., Charlotte, North Carolina

All in violation of Title 18, United States Code, Section 1341.

CAROLE S. RENDON  
Acting United States Attorney

By:

  
ROBERT E. BULFORD  
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